

24-FEB-2016

COMMENT on RM-11759

In the matter of FCC PUBLIC NOTICE Report #3039. Dated February 22, 2016 regarding RM-11759, To amend part 97, submitted on behalf of the A.R.R.L. I wish to rebut comments of others:

R.A Conner comments in essence, that because a group of amateurs on a select panel formulated the petition on behalf of the ARRL; the commission needs to disregard the petition. That is moot and has no substance as rule making can be initiated by just a single individual. Further, anyone for or against the petition is factually biased.

Jeffery Otterson indicates the petition needs to be denied because of Mexico and Canada. Radio waves travel the world. The petition addresses not only ITU Region 2, but also Region 1.

Ronald H Shemahl, K2PSD and Jeffery Strickler W9GY, address extra class licensees and claims the petition reduces the desire to upgrade. That is a current problem with "Question Pool Memorized" Extras that have no operating skills. The ARRL petition allows for lower class operators to improve hands on operating and consistent with CFR47 Part 97.1(c) & 97.1(d). Specifically in areas of "advancing skills" and "trained operators". Neither is accomplished by quick upgrading. It is akin to reading a book on piano, then trying to play one.

Ronald H Shemahl, K2PSD argues against the petition because RTTY is mentioned but fails to point out the petition uses the term RTTY/data. The FCC does not distinguish a RTTY ONLY sub band, nor exclude it because it is an archaic mode. Or would the commission eliminate Double Side Band operation? Also archaic, as **James Bromley K7JEB** indicated that is his concern, in his comment.

The above rebuttles to comments made this date indicate everyone wants it his way. A narrow view. It is imperative for the FCC to weigh the merits of the petition regarding all operator class licenses; Novice, Technician, General, Advanced and Extra. As there are all of those class operators, today and into the future. Likewise operating modes, CW, RTTY, DATA, Double Sideband, Single Sideband, and AM. Probably a few others unmentioned.

The ARRL petition considers all classes of licensees, address most modes, offers relocations and in some cases expanded privileges under certain circumstances. That makes the proposed rule making a better situation than what we now have and worthy of FCC consideration.

CONCLUSION (again): The 75/80 meter band (3500-4000 Khz) continues to be a work horse band and is extremely popular. The Rule Making Request is Reasonable and provides "Good engineering practice"; and more than acceptable trade offs regarding all concerned. This filing needs to be approved.

Thank you for allowing me to comment in this regard,

A handwritten signature in dark ink, appearing to read "Lawrence Macionski", with a stylized flourish at the end.

Lawrence Macionski, W8LM
ARRL Life Member

FCC CERTIFIED Volunteer Examiner, ARRL Team Leader
President, VFW Post 3115 Amateur Radio Club, W0VFW, Wichita, KANSAS, 2nd term.
Charter Member, 3905 Century Club Worked All States and Awards Net- since 1977